

REMARKS

Claims 48-84 were presented for examination and were pending in this application. In an Office Action dated June 28, 2007, claims 48-84 were rejected. Applicants have amended claims 48, 55, 65, 74 and 78. Applicants now respectfully request consideration of the application in view of the above amendment and the following remarks.

Response to Rejection Under 35 USC 103(a)

In the 4th paragraph of the Office Action, Examiner rejected claims 48-61, 63-71, 73-80 and 82-84 as allegedly being unpatentable over U.S. Patent No. 6,631,386 to Arun et al. (“Arun”) in view of U.S. Patent Publication No. 2005/0144198 to Bergstraesser et al. (“Bergstraesser”). This rejection is overcome in view of the amended claims.

As amended, claims 48, 55, 65 and 74 variously recite “resolving conflicts between the first version of the associative array and the second version of the associative array, wherein resolving conflicts includes receiving a user input specifying a conflict resolution procedure responsive to identifying a conflict.” (emphasis added) Hence, the amended claims recite generating a third version of an associative array which incorporates changes from a first version of the associative array and a second version of the associative array. Additionally, generation of the third version of the associative array resolves conflicts between the first version of the associative array and the second version of the associative array responsive to user input. Specifically, as the third version of the associative array is generated, a conflict resolution procedure is received from a user responsive to identification of a conflict. Receiving a conflict resolution procedure responsive to conflict identification allows for implementation of conflict-specific resolution procedures. For example, the conflict resolution procedure allows user selection of individual data values from the first version of the associative array or from the

second version of the associative array when a conflict is identified rather than selecting all data from one version of the associative array when a conflict is identified. This allows the third version of the associative array to be customized to include different data values from each version of the associative array.

In contrast, Arun discloses a database version control system where a database table includes “at least some” records having “a version control field including version control information.” Arun, col. 3, lines 58-61. Specifically, in Arun, each row of a database table includes version management fields identifying the current version of the row and subsequent versions of the row. *See*, Arun, FIG. 2, col. 5, line 60 to col. 6, line 11. Thus, the version management fields merely describe a version tree which specifies the relationship between different versions of the database and are used to retrieve data from different versions of the database. *See*, Arun, col. 6, line 63 to col. 7, line 4; col. 8, lines 40-60. Further, Examiner admits that Arun does not explicitly disclose “generating a third version of the associative array by merging modifications from the first version of the associative array and the second version of the associative array and resolving conflicts between the first version of the associative array and the second version of the associative array,” as claimed. Therefore, Arun does not disclose “generating a third version of the associative array by merging modifications from the first version of the associative array and the second version of the associative array and resolving conflicts between the first version of the associative array and the second version of the associative array, wherein resolving conflicts includes receiving a user input specifying a conflict resolution procedure responsive to identifying a conflict,” as variously recited in the amended claims.

Bergstraesser does not remedy the deficient disclosure of Arun. Rather, Bergstraesser merely discloses a method for managing versions of objects where objects are only copied when absolutely necessary. Bergstraesser, Abstract; ¶¶ [0014]-[0018]. As part of the version management, Bergstraesser uses a data model to propagate relationships between versions and resolve conflicts affecting property values and relationship contents. Bergstraesser, ¶¶ [0016]-[0018]. To resolve conflicts, Bergstraesser discloses a “MergeVersion” operation which manages changes between multiple versions and resolves conflicts between versions by applying various rules. Bergstraesser, ¶ [0063] and [0065]. However, the “MergeVersion” operation in Bergstraesser merely uses a set of rules and a flag value indicating a primary and a secondary version of the object. Based on the flag setting, Bergstraesser modifies all relationships in the versions according to a predetermined set of rules. Bergstraesser, ¶¶ [0067]-[0069]; Table 3. Hence, Bergstraesser uniformly applies a set of rules to all items in a version. For example, data updated in the primary version is always preserved when merging primary version and secondary version. Similarly, data deleted from the primary version is always deleted when merging the primary version and secondary version. *See* Bergstraesser, Table 3. Unlike the claimed invention, Bergstraesser does not receive user input responsive to identifying a conflict, but only receives user input prior to merging versions. Hence, the user input in Bergstraesser merely identifies a global policy applied to all conflicts encountered when merging versions rather than specify a conflict resolution policy responsive to an identified conflict. Therefore, the version management in Bergstraesser does not disclose “resolving conflicts between the first version of the associative array and the second version of the associative array, wherein resolving conflicts includes receiving a user input specifying a conflict resolution procedure responsive to identifying a conflict,” as claimed.

Thus, neither of the cited references, taken alone or in combination, teaches or suggests the claimed invention. Therefore, amended claims 48, 55, 65 and 74 are patentably distinct from the cited references, both alone and in combination, and withdrawal of the rejection is respectfully requested.

Claims 49-54 depend from claim 48, so all arguments advanced above with respect to claim 48 are hereby incorporated so as to apply to claims 49-54. Claims 56-61, 63 and 64 depend from claim 55, so all arguments advanced above with respect to claim 55 are hereby incorporated so as to apply to claims 56-61, 63 and 64. Claims 66-71 and 73 depend from claim 65, so all arguments advanced above with respect to claim 65 are hereby incorporated so as to apply to claims 66-71 and 73. Claims 75-80 and 82-84 depend from claim 74, so all arguments advanced above with respect to claim 74 are hereby incorporated so as to apply to claims 75-80 and 82-84. Therefore, claims 49-54, 56-61, 63, 64, 66-71, 73, 75-80 and 82-84 are patentably distinct from the cited references, both alone and in combination, and withdrawal of the rejection is respectfully requested.

In the 5th paragraph of the Office Action, Examiner rejected claims 62 and 81 as allegedly being unpatentable over Arun in view of Bergstraesser in further view of U.S. Patent No. 5,684,990 to Boothby (“Boothby”). This rejection is overcome in view of the amended claims.

Boothby does not remedy the deficient disclosure of Arun and Bergstraesser. Rather, Boothby discloses a method for synchronizing two or more databases. *See* Boothby, col. 3, lines 16-23. In Boothby, a status file containing all of the data in two databases and is used to generate a set of updating decisions used to modify each database. *See* Boothby, col. 3, lines 24-33. The set of updating decisions is then used to generate a “To-Do List” specifying how to

modify the contents of each database. *See* Boothby, col. 6, lines 19-38. Hence, Boothby does not disclose “resolving conflicts between the first version of the associative array and the second version of the associative array, wherein resolving conflicts includes receiving a user input specifying a conflict resolution procedure responsive to identifying a conflict,” but merely discloses modifying multiple databases using a generated set of instructions.

Hence, the combination of Arun, Bergstraesser and Boothby, both alone and in combination, fail to teach or suggest the subject matter of claims 62 and 81. Therefore, claims 62 and 81 are patentably distinguishable over the cited references, both alone and in combination and withdrawal of the rejection is respectfully requested.

In the 6th paragraph of the Office Action, Examiner rejected claim 72 as allegedly being unpatentable over Arun in view of Bergstraesser in further view of U.S. Patent Publication No. 2004/0230569 to Rys et al. (“Rys”). This rejection is overcome in view of the amended claims.

Rys does not remedy the deficient disclosure of Arun and Bergstraesser. Rather, Rys discloses a method for exchanging data across different computer systems using a relational database environment. *See* Rys, ¶ [0005] and [0008]. In Rys, data is transformed between a hierarchical format, such as XML, and a rowset format, such as a relational database. *See* Rys, ¶ [0030], FIG. 2. Hence, Rys merely discloses a method for converting data from a hierarchical format to a format capable of being efficiently accessed by a query processor and makes no disclosure of merging versions of an associative array, much less of “resolving conflicts between the first version of the associative array and the second version of the associative array, wherein resolving conflicts includes receiving a user input specifying a conflict resolution procedure responsive to identifying a conflict,” as claimed. *See* Rys, ¶ [0035].

Hence, the combination of Arun, Bergstraesser and Rys, both alone and in combination, fail to teach or suggest the subject matter of claim 72. Therefore, claim 72 is patentably distinguishable over the cited references, both alone and in combination and withdrawal of the rejection is respectfully requested.

CONCLUSION

In sum, Applicants respectfully submit that claims 48-84, as presented herein, are patentably distinguishable over the cited references (including references cited, but not applied). Therefore, Applicants request reconsideration of the basis for the rejections to these claims and requests allowance of them.

In addition, Applicants respectfully invite the Examiner to contact Applicants' representative at the number provided below if the Examiner believes it will help expedite furtherance of this application.

Respectfully submitted,
Lawrence W. McVoy, et al.

Dated: December 24, 2007

By: /Brian G. Brannon/
Brian G. Brannon, Registration No. 57,219
Attorney for Applicants
Fenwick & West LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041
Tel.: (650) 335-7610
Fax: (650) 938-5200